

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LI ZHEN ZHU,

on behalf of herself and others similarly situated,

Plaintiff,

Case No. 18-cv-00417 (ILG)
(MMH)

v.

WANRONG TRADING CORP.,

TAI HE TRADING CORP.,

YI ANG SHAO,

XIANG QI CHEN,

MING REN XU, and

TAO TAO REN,

Defendants.
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**NOTICE OF MOTION FOR AN ORDER (1) CONDITIONALLY CERTIFYING
SETTLEMENT CLASS, (2) GRANTING PRELIMINARY APPROVAL TO PROPOSED
CLASS SETTLEMENT AND PLAN OF ALLOCATION, (3) DIRECTING
DISSEMINATION OF NOTICE AND RELATED MATERIAL TO THE CLASS, AND (4)
SETTING DATE FOR FAIRNESS HEARING AND RELATED DATES**

For the reasons set forth in the accompanying Memorandum of Law in Support of Motion for an Order (1) Conditionally Certifying Settlement Class, (2) Granting Preliminary Approval to Proposed Class Settlement and Plan of Allocation, (3) Directing Dissemination of Notice and Related Material to the Class, and (4) Setting Date for Fairness Hearing and Related Dates (“Motion for Preliminary Approval”), and the Declaration of Aaron B. Schweitzer in Support of Motion for Preliminary Approval (“Schweitzer Declaration”), Plaintiffs respectfully request that the Court enter an Order:

1. granting preliminary approval of the Settlement Agreement and Release (“Settlement Agreement”), attached as **Exhibit 1** to the Schweitzer Declaration;
2. certifying the proposed Class for settlement purposes;
3. appointing Troy Law, PLLC (“Troy Law” or “Plaintiffs’ Counsel”) Class Counsel;

4. approving the proposed Notice of Class Action Settlement (“Class Notice”), attached as **Exhibit 2** to the Schweitzer Declaration; and
5. granting such other, further, or different relief as the Court deems just and proper.

Plaintiff has submitted a Proposed Order, attached hereto as **Exhibit 1**, for the Court’s convenience.

Dated: Flushing, NY
August 17, 2022

Respectfully submitted,
TROY LAW, PLLC

/s/ Aaron B. Schweitzer
Aaron B. Schweitzer
John Troy
Tiffany Troy
41-25 Kissena Boulevard
Suite 103
Flushing, NY 11355
(718) 762-1324
troylaw@troypllc.com
Attorneys for Plaintiffs and Proposed Class